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United States Department of the Interior

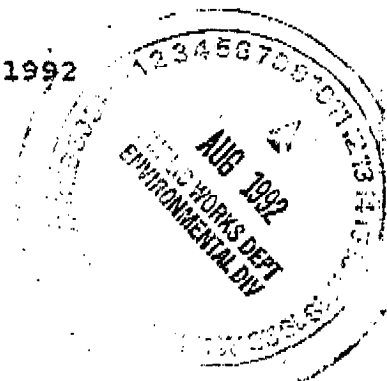
FISH AND WILDLIFE SERVICE

CARIBBEAN FIELD OFFICE

P.O. BOX 491

BOQUERON, PUERTO RICO 00622

August 10, 1992



Mr. Sindulfo Castillo
Environmental Engineering Division
Roosevelt Roads Naval Station
Box 3021 - FPO AA 34051-3001

Re: RI/FS studies on
Roosevelt Roads Naval
Station

Dear Mr. Castillo:

This is to follow up our July TRC meeting to discuss various Remedial Investigations and proposed actions for different sites around the naval station. We are concerned with the possible impacts to the Federal Trust Resources such as the listed Antillian manatee, green sea turtle, hawksbill sea turtle, the yellow-shouldered blackbird, the brown pelican and migratory birds. All of the above species use the bordering mangroves and marine environment to some extent. The manatee and green sea turtle feed on the seagrass beds that surround the base. Possible impacts to these species and the rest of the base's fauna and flora should be also included in any risk assessment. We are concerned with the following sites:

Site 2, Vieques. This area is adjacent to the entrance of a large lagoon complex in Vieques. It was impacted by an oil spill last year and seems to be a old dump of sorts. Biological sampling and pore water analysis should be included in any evaluation of the site. Fiddler crabs (*Uca* spp.) can be used as a good biological indicator of the site. They can also be used as a surrogate species for the land crabs that are fished by local fishermen. Sites 5 & 6. Should include pore water analysis of adjacent mangrove forests.

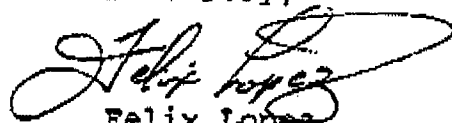
Site 7, station landfill. The footprint of the landfill extends into mangrove wetlands which border Ensenada Honda Bay. We are concerned that leachate might be reaching the wetlands and marine environment. Sediment pore water analysis should be conducted in mangrove areas. Seagrass has been used in the past for metals analysis and adjacent seagrass beds should be tested for possible elevated metal levels. Green sea turtles feeding in this area could be impacted.

Site 16, the old power plant. The elevated levels of PCB's in the intake and outfall tunnels could possibly be contaminating the near shore marine environment. Future sampling should include marine sediments and benthic organisms to see if PCB's are being taken into the food chain.

Site 14, Ensenada Honda shoreline and mangroves. These mangrove wetlands have been impacted several times by spills occurring in the bay. The most devastating was the November 27, 1986 JP-5 spill which impacted mangroves north of the US Coast Guard pier. Over 3 acres of red, black and white mangroves were directly killed off. The Puerto Rico Department of Natural Resources and US Forest Service planned to monitor the site for recovery. Tides and wind pushed the fuel several hundred meters into the mangroves. I am concerned that the old booms are still in the mangroves. We had recommended removal of those booms in 1986. Sampling in the area should include sediment pore water. We have reason to believe that hydrocarbons can be buried and trapped in the mangrove sediments since disturbance of the sediments in 1987 produced a sheen on surface waters. We feel that the sample sites should be moved further inland and away from the fringing red mangroves. Surface water samples might not show anything, however the pore water analysis would be more productive.

We look forward to working with your consultants on these sites. If you have any questions please call.

Sincerely,



Felix Lopez
Acting Field Supervisor